

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

In re: Vitamins Antitrust Litigation

MDL No. 1285

Misc. No. 99-0197 (TFH)

This Document Relates To:

ALL CASES

FILED

SEP 10 2001

NANCY MAYER WHITTINGTON, CLERK
U.S. DISTRICT COURT

STIPULATION AND ~~PROPOSED~~ ORDER

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, that paragraph 8 of the Stipulation Regarding Production of Interrogatory Responses, Preexisting Electronic or Summary Transactional, Cost and Financial Data, and Privilege Logs by Certain Parties, dated August 15, 2001, is modified as follows:

8. With the exception of the limited specific Milk Products waiver set forth in paragraph 5 of this stipulation, this stipulation is intended to preserve all outstanding issues relating to the production or logging of the Foreign Defendants' Governmental Submissions Documents and Internal Investigation Documents. The briefing schedule on all such issues before Special Master Pollak shall be as follows: (1) plaintiffs shall serve an appropriate motion on or before September 7, 2001 (instead of August 31, 2001); (2) the Foreign Defendants shall serve an appropriate opposition to the plaintiffs' motion on or before September 25, 2001 (instead of September 14, 2001); and (3) plaintiffs shall serve an appropriate reply in further support of their motion on or before a date to be determined by plaintiffs following service of the Foreign Defendants' opposition to plaintiffs' motion (as opposed to September 24, 2001).

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Respectfully submitted,

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By: 

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Industries, Takeda Vitamin & Food USA, Inc.,
and Takeda U.S.A., an On Behalf of All
Defendants For Purposes of This Stipulation*

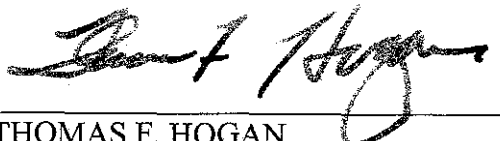
FREEMAN, FREEMAN & SALZMAN

By: 

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*On Behalf of All Plaintiffs for Purposes
of This Stipulation*

SO ORDERED:


THOMAS F. HOGAN
UNITED STATES DISTRICT JUDGE

Dated: Sept. 10, 2001